

REMARKS/ARGUMENTS

- Amendments -

Applicant respectfully requests that the pending claims be amended as indicated in the accompanying amended page(s), in which:

- Claims 1, 2, and 4 to 11 are amended to better define the invention.

By these amendments, claims 1,2 and 4 to 11 remain pending. Applicant submits that no new matter has been added by these amendments.

Applicant further requests that the specification be amended as indicated in the accompanying amended pages to remove the statement pertaining to the cross-referenced applications being referred to by their filing docket number.

- Remarks -

Specification

The specification has been amended to remove the statement that: *"The above applications have been identified by their filing docket number, which will be substituted with the corresponding application number, once assigned."*

35 USC §112

Responsive to the §112 rejection of claims 2, and 4 - 11, said claims have been amended to recite proper antecedent basis.

35 USC §103(a)

In the instant office action, claim 1 is rejected under §103(a) over Enomoto et al. (US 5,974,401) in view of Wen (US 6,109,745). In the rejection, it is asserted that Enomoto et al. teaches the use of a variety of printers depending on what type of print the customer orders, and that one of these variety of printers is an ink jet printer. From this, the rejection asserts that it would have been obvious to use plain paper in an ink jet printer in order to fulfill a customer's print order.

Moreover, the Response to Arguments, asserts that the features upon which applicant relies (e.g., using plain paper) are not recited in the rejected claims.

Applicant respectfully traverses the above assertions of the present rejection.

It is submitted that none of the cited references teach or suggest a method which utilizes a digital photofinishing system in which a photographic image is printed on plain paper, and which furnishes a printed plain paper image to a customer.

In response to the assertion that utilizing plain paper would have been obvious from the description of Enomoto et al., Applicant submits that such an assertion is untenable as Enomoto et al. do not teach or suggest such an approach. Col. 4, lines 66 - 67, of Enomoto et al. , for example, explicitly states that printers 15 to 17 are loaded with different sizes of photographic materials. As would be understood by one of ordinary skill in the art, "photographic materials" refers to special media that does not include plain paper.

Col. 5, lines 34-37, also highly suggest that the ink jet printer 17 is loaded with negative-to-positive type color paper, rather than plain paper.

Enomoto et al. appear to be silent as to the use of plain paper in a digital photo finishing system. In this regard, Applicant respectfully submits that the rejection's assertion that the use of plain paper would have been obvious is unsubstantiated by the presently cited references, and hence, the requisite *prima facie* case of obviousness has not been properly established.

Applicant maintains that the invention of claim 1, in which printing of a photographic image is effected on plain paper, and the printed plain paper image is furnished to a customer and the customer charged for the printing service, is not rendered obvious by the combination of Enomoto et al. and Wen.

Regarding the assertion that the features on which Applicant relies upon in our arguments is not recited in the rejected claims, Applicant respectfully disagrees. Claim 1 explicitly recites, *inter alia*:

- utilizing a digital photofinishing system that incorporates means for feeding plain paper to the printer from a roll of plain paper,
- in response to the drive signal, effecting page-width printing of the photographic image on the plain paper, and
- furnishing the printed plain paper image to the customer and charging the customer for the printing service

Applicant respectfully submits that the above points being argued are recited in at least the above portions of claim 1.

Dependent claims 2, and 4 to 11, are submitted to be novel and inventive for at least the same reasons as presented above with regards to independent claim 1.

Favorable reconsideration of the application in light of the above amendments and remarks is respectfully requested. Applicant looks forward to word of further official communication in due course.

Very respectfully,

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